

Remarks

Claims 1-8, 10-19, 30 and 31 are currently pending. Claims 30 and 31 were rejected for a written description/new matter concern. The other claims were rejected based on various combinations of art. In view of the amendment above, and remarks below, reconsideration is requested.

Claims 30 And 31

The Office Action indicated that claim 30 (and thus 31) included a reference to a non-circular orbital body. It is respectfully noted that they do not. The term "non-circular" was used with reference to the path of the brush.

In paragraph [0039] of the original specification there was a clarification that the term "reciprocate" (e.g. as present in original claim 30) referred to a linear motion or an orbital motion resulting from translating the center of a circular path. It was specifically emphasized in paragraph [0039] that pure rotational motion, without translation, was not within the definition of "reciprocate". See also the original abstract which described the brush orbiting. Hence, it was within the possession of the Applicants for there to be non-circular motion for the brush.

Nevertheless, to avoid any concern about the adequacy of the support for the claim 30 language, the term "non-circular" has now been removed from claim 30.

Art Rejections

Claims 30 and 31 of the application were not rejected based on art. With respect to the other pending claims, Applicants have now included the perforated packet/double peel-off layer claim 4 subject matter in claim 1, cancelling claim 4 to avoid redundancy. The only rejection of claim 4 subject matter relied on a combination of Adams, Girardot et al., Zayas and Blaustein et al. None of these cited references taught the triangular reciprocating feature.

The Office Action acknowledges that a triangular shape could clean corners better than a circular one. However, it asserted that such a shape would not have better performance than a rectangular reciprocating pad (e.g. like Adams).

A rectangular reciprocating system would tend to jam dirt into a corner as it slid along a wall. In contrast a triangular pointed pad jabs somewhat like a sword at the corner, breaking up the material caught in the corner. Hence, a triangular pad is preferred over a rectangular one for corner cleaning. The fact that both the present

device and an Adams type device could also be used to clean flat walls apart from corners does not detract from the additional advantage that the present device has.

In any event, claim 1, and the remaining claims dependent thereon, now also incorporate claim 4 subject matter relating to the perforated packet and two peel-off layers. U.S. patent 6,406,206 was focused on a manual applicator pad for delivering deodorant, cosmetics and the like. There was no suggestion of how to mount such a pad to a motorized cleaning device, much less how to do so with a double peel-off layer concept.

Specifically, there was nothing in this reference suggesting or motivating combining a first peel-off layer to provide access to the packet for easy installation or replacement, in combination with a second peel-off layer on the packet to open it to initiate delivery. The emphasis in this patent was on needing to compress the packet to cause delivery. This would have taught away from use of a further cover (apart from the peel-off cover over the perforations).

Conclusion

Accordingly, claims 1-3, 5-8, 10-19, 30 and 31, as further amended, are believed to be in allowable form. No additional fees are believed necessary for consideration of this response. However, should any additional fees nevertheless be needed for full consideration of this amendment, please charge any fees believed necessary in connection with this response to Deposit Account No. 10-0849 .

Respectfully submitted,

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